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3 REMARKS
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5 The indication of allowability of claims 2, 4, 6-8, and 10-11 is noted with
6 appreciation.
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8 The rejection of claims 1 and 3, 5, and 9 under 35 USC 103 is respectfully
9 traversed.
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11 With respect to claim 1, Applicants note that Nakagawa says nothing about
12 the resistivity of the TaN, which is now incorporated in claim 1. Support
13 is provided in paragraph 28..
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15 Applicants maintain that the combination of Nakagawa and Kimock is not
16 proper. Applicants call the Examiner's attention to col 3, line 46 - 48 and
17 col 5, lines 18 - 42, in which Kimock teaches that the step of depositing the
18 TaN is performed by sputter etching the substrate.
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20 Accordingly, the surface of the substrate would be damaged and changed.
21 Neither Kimock nor Nakagawa deal with the electrical properties of the
22 substrate nor with the effect it would have on an integrated circuit.
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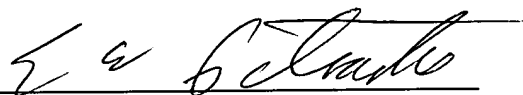
24 Indeed, the Kimock reference comes from a non-analogous art - optical
25 fabrication and abrasion protection.
26

27 Thus, since the Kimock reference teaches nothing about alignment and the
28 Nakagawa reference teaches nothing about optical alignment, there is no
29 motivation to combine the two references.
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31 Applicants maintain that claims 3, 5 and 9 are patentable as being
32 dependent on a patentable claim 1.
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34 In view of the preceding, allowance of the claims is respectfully solicited.
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36 Respectfully submitted,
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